

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

BRUCE HARRIS and ROY  
MCCULLUM, Individually and Behalf  
of All Others Similarly Situated,  
Plaintiffs,

v.

GEORGIA-PACIFIC WOOD  
PRODUCTS LLC and GEORGIA-  
PACIFIC CONSUMER OPERATIONS  
LLC,  
Defendants.

CIVIL ACTION  
NO. 1:22-cv-02530-TWT

**JOINT MOTION TO EXTEND DISCOVERY**

Plaintiffs Bruce Harris and Roy McCullum and Defendants Georgia-Pacific Wood Products LLC and Georgia-Pacific Consumer Operations LLC jointly move for a thirty-day extension of the discovery deadline. In support of this motion, the parties show the Court as follows.

1. Plaintiffs initiated this action on June 24, 2022, asserting claims for unpaid overtime under both federal and Arkansas Law. (ECF No. 1.) They brought this action as a nationwide FLSA Collective Action and Arkansas Rule 23 class action. (*Id.*)

2. On March 23, 2023, after briefing by the parties, the Court denied Plaintiffs' motion for conditional certification of the FLSA collective and Plaintiffs' motion for class certification of the Arkansas class. (ECF No. 47.)

3. Subsequently, in an effort to conserve effort and expense for both sides, the parties agreed to explore whether this case can be resolved without further litigation and expense.

4. To this end, the parties agreed to the informal exchange of information and data tailored to making these discussions as successful as possible. Specifically, Defendants have provided Plaintiffs with the electronic time data and pay data for Plaintiffs Harris and McCullum and the three opt-in plaintiffs who joined this suit prior to the Court's order denying conditional certification.

5. Discovery is set to close on July 31, 2023. (ECF No. 27.) However, the parties have realized that they will need additional time to complete their fact investigations and analyses and be fully prepared to attempt to resolve this case.

6. After conferring in good faith, the parties agreed that, for the benefit of both parties, the discovery deadline should be extended by 30 days. Extending this deadline and forestalling additional discovery will allow the parties to conserve resources as they continue to explore whether a resolution can be reached. In the

undersigned's experience, conserving resources by both sides can work to increase the chances that this matter can be resolved without further litigation.

7. This motion is brought for good cause, will not unduly delay the proceedings, and will not prejudice either party.

8. The requested extension is also consistent with Rule 1, which states that the Federal Rules of Civil Procedure "should be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding." Fed. R. Civ. P. 1.

9. The parties have conferred about this motion and have agreed to file it jointly. A proposed Order is provided for the Court's convenience.

For the foregoing reasons, the parties respectfully request a 30-day extension of the discovery deadline, up to and including August 30, 2023.

Respectfully submitted this 26th day of July 2023.

/s/ Josh Sanford

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**CERTIFICATE OF SERVICE**

I certify that on July 26, 2023, I electronically filed the **Joint Motion to Extend Discovery** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys of record:

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